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November 13, 2024

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
Courtroom 11D

**Re: *FCS Advisors, LLC, v. Theia Group, Inc., et al.*,
Case No. 21 Civ. 6995 (PKC)**

Dear Judge Castel:

We write on behalf of Basler Turbo Conversions, L.L.C. (“Basler”) to supplement Basler’s Opposition to CogniSphere’s Motion to Compel (ECF No. 461) by updating the Court as to a material fact that has occurred since Basler filed its opposition last Friday, November 8, 2024. In particular, the imminent final FAA approval discussed in Basler’s opposition has now been granted. Filed herewith is the Supplemental Declaration of Joseph Varkoly establishing this fact. We respectfully request that the Court consider this Supplemental Declaration in the context of Basler’s previously filed Opposition.

In addition, while Basler believes, as set forth in its Opposition, that the matters raised by CogniSphere’s Motion are limited and may be dealt with in a summary manner, to the extent the Court desires to explore any such matters in more detail, Basler respectfully requests that the Court schedule oral argument to allow the parties the opportunity to be heard on any such matters.



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Thank you for your attention to this matter.

Respectfully submitted,

/s/ Anne B. Sekel

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cc: All counsel of record